

United States District Court
Southern District of Texas
FILED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

MAY 2 4 2016

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

S 2 2 2 2 2 2 2 2

Criminal No.

M-16-789

**JUAN ANTONIO DE LA GARZA
also known as "GEMA"
MARTHA ALICIA BENTANCOURT
MONTELONGO-VILLARREAL JUAREZ
JUAN VILLARREAL MONTELONGO
RAMON OMAR ALVARADO**

SEALED INDICTMENT

THE GRAND JURY CHARGES THAT:

Count One

From on or about December 1, 2013 to on or about December 31, 2014, in the United States and within the jurisdiction of the Court, defendants,

JUAN ANTONIO DE LA GARZA
also known as "GEMA"

and

MARTHA ALICIA BENTANCOURT JUAREZ

did knowingly and intentionally conspire and agree together with other persons known and unknown to the Grand Jurors with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate or foreign commerce involving property represented by a law enforcement officer, to be the proceeds of said specified unlawful activity, or property used to conduct or facilitate the specified unlawful activity, to wit: possession with intent to distribute methamphetamines.

In violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(3)(B).

Count Two

On or about January 1, 2015 and continuing up to and including the date of the return of the indictment, in the United States and within the jurisdiction of the Court, defendants,

JUAN ANTONIO DE LA GARZA

also known as "GEMA"

MARTHA ALICIA BENTANCOURT JUAREZ

JUAN ~~VILLARREAL~~ MONTELONGO MONTELONGO-VILLARREAL

and

RAMON OMAR ALVARADO

did knowingly and intentionally conspire and agree together with other persons known and unknown to the Grand Jurors with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate or foreign commerce involving property represented by a law enforcement officer, to be the proceeds of said specified unlawful activity, or property used to conduct or facilitate the specified unlawful activity, to wit: possession with intent to distribute methamphetamines.

In violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(3)(B).

NOTICE OF CRIMINAL FORFEITURE

18 U.S.C. § 982(a)(1)

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to the defendants,

JUAN ANTONIO DE LA GARZA

also known as "GEMA"

MARTHA ALICIA BENTANCOURT JUAREZ

JUAN ~~VILLARREAL~~ MONTELONGO MONTELONGO-VILLARREAL

and

RAMON OMAR ALVARADO

that upon conviction of an offense in violation of Title 18, United States Code, Section 1956 as charged in Counts One and Two of this Indictment, including conspiracy, all property, real or personal, involved in such offense, and all property traceable to such property, is subject to forfeiture.

The property subject to forfeiture includes:

Approximately \$220,000.

MONEY JUDGMENT

Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture for which the defendants may be jointly and severally liable, and which is at least \$220,000 in United States currency.

SUBSTITUTE ASSETS

In the event the property that is subject to forfeiture, as a result of any act of omission of a defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty.

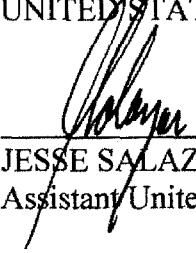
it is the intent of the United States to seek forfeiture of any other property of a defendant up to the value of such property, pursuant to Title 18, United States Code, Section 982(b)(1) incorporating

Title 21, United States Code, Section 853(p).

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By: 

JESSE SALAZAR
Assistant United States Attorney